

Reconsideration of the rejection of claims 1-37 rejected under 35 U.S.C. §103(a) as being unpatentable over Fujimoto, U.S. Patent No. 5,912,710, 6/1999, 348/445, is respectfully requested in light of the amendment to the claims and for the following reasons.

As per independent claim 1: By this amendment, independent claim 1 has been canceled. As per dependent claims 2 and 21: Claim 2 has been amended to add, in lines 1-4, the limitation, not disclosed by Fujimoto, *"wherein the video graphics display engine allocates a size of the first memory block of the single memory and a size of the second memory block of the single memory based on needs of the video data and the graphics data, respectively"*. This added limitation finds support on page 4, lines 11-12, of the specification. Claim 21 remains dependent upon amended independent claim 20. Also, claim 21 adds additional novel subject matter.

As per dependent claims 3 and 22: Claims 3 and 22 remain dependent upon amended claim 4 and amended claim 20, respectively. Also, claims 3 and 22 add additional novel subject matter. As per dependent claim 4: Claim 4 has been made independent and now includes as the last element thereof, the following limitation, not disclosed by Fujimoto, *"a single memory operably coupled to the graphics scaler and to the video scaler, the single memory further comprises a first memory block and a second memory block, wherein the stream of video data is fetched from the first memory block and the stream of graphics data is fetched from the second memory block"*. This added limitation finds support on page 5, lines 3-4, of the specification.

As per dependent claim 5: Claim 5 has been amended and adds additional novel subject matter. As per dependent claim 6: Claim 6 has been amended to be dependent upon newly independent amended claim 4. Also, claim 6 adds additional novel subject matter. As per dependent claim 7: Claim 7 has been amended to be dependent upon newly independent amended claim 4. Also, claim 7 adds additional novel subject matter.

As per dependent claims 8 and 23: Claim 8 has been amended to be dependent upon newly independent amended claim 4. Also, claim 8 adds additional novel subject matter. Claim 23 remains dependent upon amended claim 20. Also, claim 23 adds additional novel subject matter. As per dependent claim 9-11: Claims 9-11 have been amended to be dependent upon newly independent amended claim 4. Also, claims 9-11 add additional novel subject matter.

As per dependent claims 12-13 and 24-25: Claims 12-13 have been amended to be dependent upon newly independent amended claim 4. Also, claims 12-13 add additional novel subject matter. Claims 24-25 remain dependent upon amended claim 20. Also, claims 24-25 add additional novel subject matter.

As per dependent claim 14-16: Claims 14-16 have been amended to be dependent upon newly independent amended claim 4. Also, claims 14-16 add additional novel subject matter.

As per dependent claims 17-19 and 28-29: Claims 17-19 have been amended to be dependent upon newly independent amended claim 4. Also, claims 17-19 add additional novel subject matter. Claims 28-29 remain dependent upon amended claim 20. Also, claims 28-29 add additional novel subject matter.

As per independent claim 20: Claim 20 has been narrowed by adding two additional steps, not taught by Fujimoto, *"allocating a first block of a memory for storing the video data stream, the allocating based upon memory needs of the video data stream"*, and *"allocating a second block of the memory for storing the graphics data stream, the allocating based upon memory needs of the graphics data stream"*. These additional steps find support on page 4, lines 11-12, and on page 14, lines 12-14, of the specification. As per dependent claims 26-27: Claims 26-27 remain dependent upon amended claim 20. Also, claims 26-27 add additional novel subject matter.

As per independent claim 30: The first element of claim 30 has been amended to now read, *"a frame buffer having memory, wherein the video graphics integrated circuit allocates memory between video data and graphics data based upon memory needs of the video data and the graphics data"*. The first element of amended claim 30 is not taught by Fujimoto. The changes to the first element of claim 30 find support on page 4, lines 11-12, and on page 14, lines 12-14, of the specification.

As per independent claim 31: The second and third elements of claim 31 have been amended to recite that the scalers scale *independently* of each other. Fujimoto does not teach a plurality of scalers that scale independently of each other. As per dependent claims 32-33: Claims 32-33 remain dependent upon amended claim 31. Also, claims 32-33 add additional


novel subject matter. As per dependent claim 34: Claim 34 has been amended to recite that the controllers provide *separate* control information that controls *independent* scaling, which Fujimoto does not teach. As per dependent claims 35-37: Claims 35-37 remain dependent upon amended claim 31. Also, claims 35-37 add additional novel subject matter.

The prior art made of record and not relied upon is not considered pertinent to applicant's disclosure.

Attached hereto is a marked-up version of the changes made to claims 1, 2, 4-20, 30, 31 and 34 by the current amendment. By the current amendment, claim 1 has been canceled without prejudice. No new claims were added. The attached pages are captioned: "Version with Markings to Show Changes Made."

Accordingly, Applicant respectfully submits that the amended claims are in condition for allowance. The Examiner is invited to contact the below-listed attorney if the Examiner believes that a conference would expedite the prosecution of the instant application.

Respectfully submitted,

By:   
Christopher J. Reckamp  
Registration No. 34,414

Date: June 22, 2001

VEDDER, PRICE, KAUFMAN &  
KAMMHOLZ  
222 N. LaSalle Street  
Chicago, IL 60601  
(312) 609-7500  
FAX: (312) 609-5005



**VERSION WITH MARKINGS TO SHOW CHANGES MADE**

2. (Amended) The video graphics display engine of claim [1] 4 wherein the video graphics display engine allocates a size of the first memory block of the single memory and a size of the second memory block of the single memory based on needs of the video data and the graphics data, respectively, and wherein the video graphics display further comprises a controller operably coupled to the video scaler and the graphics scaler, wherein the controller provides control information to the video scaler and the graphics scaler, wherein scaling operations of the video scaler and the graphics scaler utilize the control information.

4. (Amended) [The] A video graphics display engine [of claim 1] comprising:

a video scaler adapted to receive a video data stream in a first format, wherein the video scaler scales video images in the video data stream based on a ratio between the video images in the first format and an output video image to produce a scaled video stream;

a graphics scaler adapted to receive a graphics data stream in a second format, wherein the graphics scaler scales graphics images in the graphics data stream based on a ratio between the graphics images in the second format and an output graphics image to produce a scaled graphics stream;

a merging block operably coupled to the video scaler and the graphics scaler, wherein the merging block combines the scaled video stream and the scaled graphics stream to produce a video graphics output stream; and

a single memory operably coupled to the graphics scaler and to the video scaler, the single memory further comprises a first memory block [operably coupled to the video scaler] and a second memory block [operably coupled to the graphics scaler], wherein the stream of video data is fetched from the first memory block and the stream of graphics data is fetched from the second memory block.

5. (Amended) The display engine of claim 4, wherein the [first memory block and the second memory block are] single memory is included in a frame buffer of a video graphics integrated circuit.

6. (Amended) The display engine of claim [1]4, wherein the controller further comprises a video controller operably coupled to a graphics controller,

wherein the video controller is operably coupled to the video scaler, wherein the video controller provides a first portion of the control information to the video scaler,

wherein the graphics controller is operably coupled to the graphics scaler, wherein the graphics controller provides a second portion of the control information to the graphics scaler, and

wherein the video controller and the [data] graphics controller are synchronized.

7. (Amended) The display engine of claim [1]4, wherein the merging block performs an alpha blend operation on the scaled video stream and the scaled graphics stream to produce the video graphics output stream.

8. (Amended) The display engine of claim [1]4 further comprises a digital to analog converter operably coupled to the merging block, wherein the digital to analog converter converts the video graphics output stream to an analog display signal.

9. (Amended) The display engine of claim [1]4 further comprises a display driver operably coupled to the merging block, wherein the display driver is adapted to receive the video graphics output stream in digital format, wherein the display driver formats the video graphics output stream in a display compatible format.

10. (Amended) The display engine of claim [1]4 further comprises a display driver operably coupled to the video scaler, wherein the display driver is adapted to receive the scaled video stream and produce a video display output based on the scaled video stream.

11. (Amended) The display engine of claim [1]4 further comprises a display driver operably coupled to the graphics scaler, wherein the display driver is adapted to receive the

scaled graphics stream and produce a graphics display output based on the scaled graphics stream.

12. (Amended) The display engine of claim [1]4 further comprises a graphics flicker removal block operably coupled to the graphics scaler, wherein the graphics flicker removal block removes flicker from the scaled graphics stream.

13. (Amended) The display engine of claim [1]4 further comprises a video flicker removal block operably coupled to the video scaler, wherein the video flicker removal block removes flicker from the scaled video stream.

14. (Amended) The display engine of claim [1]4 further comprises a plurality of graphics scalers, wherein each of the plurality of graphics scalers receives the graphics data stream and scales the graphics images in the graphics data stream based on a ratio between the graphics images in the second format and a corresponding output graphics image to produce a corresponding scaled graphics stream.

15. (Amended) The display engine of claim [1]4, wherein the merging block further comprises circuitry which configures a pixel rate of the video graphics output stream to produce a preferred video scaling ratio, wherein the preferred video scaling ratio is based on the ratio between the video images in the first format and the output video image.

16. (Amended) The display engine of claim [1]4, wherein the merging block further comprises circuitry which configures a pixel rate of the video graphics output stream to produce a preferred graphics scaling ratio, wherein the preferred graphics scaling ratio is based on the ratio between the graphics images in the second format and the output graphics image.

17. (Amended) The display engine of claim [1]4 further comprises a video decompression block operably coupled to the video scaler, wherein the video decompression block receives a compressed stream of video data and decompresses the compressed stream of video data to produce the video data stream.

18 (Amended) The display engine of claim [1]4 further comprises a graphics decompression block operably coupled to the graphics scaler, wherein the graphics

decompression block receives a compressed stream of graphics data and decompresses the compressed stream of graphics data to produce the graphics data stream.

19. (Amended) The display engine of claim [1]4, wherein the video data stream is a decoded MPEG data stream.

20. (Amended) A method for displaying video graphics data comprising:

receiving a video data stream, wherein the video data stream includes video data in a first format;

allocating a first block of a memory for storing the video data stream, the allocating based upon memory needs of the video data stream;

receiving a graphics data stream, wherein the graphics data stream includes graphics data in a second format;

allocating a second block of the memory for storing the graphics data stream, the allocating based upon memory needs of the graphics data stream;

scaling the video data based on a ratio between the first format and a selected video format to produce a scaled video stream;

scaling the graphics data based on a ratio between the second format and a selected graphics format to produce a scaled graphics stream; and

merging the scaled video stream and the scaled graphics stream to produce a video graphics output stream.

30. (Amended) A video graphics integrated circuit comprising:

a frame buffer having memory, wherein the [frame buffer stores] video graphics integrated circuit allocates memory between video data and graphics data based upon memory needs of the video data and the graphics data;

a video scaler operably coupled to the frame buffer, wherein the video scaler

scales the video data to produce a scaled video data stream;

a graphics scaler operably coupled to the frame buffer wherein the graphics scaler scales the graphics data to produce a scaled graphics data stream; and

a merging block operably coupled to the video scaler and the graphics scaler, wherein the merging block combines the scaled video data stream and the graphics data stream to produce a video graphics output stream.

31. (Amended) A video graphics circuit comprising:

a plurality of memory blocks, wherein each of the plurality of memory blocks stores at least one of video data and graphics data;

a plurality of video scalers, wherein each of the plurality of video scalers is coupled to at least one of the plurality of memory blocks, wherein each video scaler of the plurality of video scalers independently scales at least a portion of the video data to produce a scaled video data stream of a plurality of scaled video data streams independent from the other scaled video data streams of the plurality of scaled video data streams;

a plurality of graphics scalers, wherein each of the plurality of graphics scalers is coupled to at least one of the plurality of memory blocks, wherein each graphics scaler of the plurality of graphics scalers independently scales at least a portion of the graphics data to produce a scaled graphics data stream of a plurality of scaled graphics data streams independent from the other scaled graphics data streams of the plurality of scaled graphics data streams; and

a plurality of merging blocks, wherein each of the merging blocks is operably coupled to at least one video scaler of the plurality of video scalers and at least one graphics scaler of the plurality of graphics scalers such that each of the merging blocks receives a plurality of scaled data streams, wherein each merging block combines received scaled data streams to produce a video graphics output stream of a plurality of video graphics streams.

34. (Amended) The video graphics circuit of claim 31 further comprises a plurality of controllers, wherein each of the plurality of controllers is operably coupled to at least one scaler of a combined set of scalers that includes the plurality of graphics scalers and the plurality of



video scalers, wherein each of the plurality of controllers provides separate control information that controls independent scaling by scalers to which it is coupled.